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March 25, 2022

**BY ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

We write in relation to recent letters submitted by Baumeister & Samuels, ECF No. 7792, and Broder & Reiter, ECF No. 7793, to clarify a minor point regarding the communications between the parties.

As the Court is aware, our firm has taken lead on behalf of all *Ashton* plaintiffs in a range of settings in this MDL, and counsel for the *Burnett*, *O'Neill*, and *Federal Insurance* plaintiffs understood that we were participating in the recent discussions relating to the Da Afghanistan Bank holdings at the Federal Reserve in New York on behalf of all Ashton plaintiffs, and that we would handle downstream communications with our *Ashton* co-counsel. We kept most *Ashton* co-counsel apprised that there were ongoing discussions about a possible agreement and relayed information as it became available. Earlier this week, we updated *Ashton* co-counsel concerning the recent discussions and the agreement between the *Federal Insurance*, *Burnett*, *O'Neill* and *Havlisch* plaintiffs. We are working to facilitate a coordinated approach on behalf of the *Ashton* group, to the extent feasible.

Respectfully Submitted,

By: */s/ Andrew J. Maloney*  
Andrew J. Maloney, III